

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

TYSON FOODS, INC. and TYSON
CHICKEN, INC.,

Plaintiffs,

v.

ELIJAH (ELI) SKAGGS, MELISSA
SKAGGS, SKAGGS BROS & SONS
FARMS LLC, and DOES #1-6,

Defendants.

Case No.: 1:24-cv-00150

UNSEALED MOTION FOR PARTIAL SEALING PURSUANT TO LOCAL RULE 13.05

1. Tyson Foods, Inc. and Tyson Chicken, Inc. (together, “Tyson”) move for partial sealing pursuant to Local Rule 13.05.
2. A sealed memorandum in support of this unsealed motion for partial sealing is being filed separately in connection with this motion as required by Eastern District of Missouri Local Rule 13.05A(4)(b)(i).
3. The specific document to be partially sealed is the Complaint filed concurrently herewith in the Eastern District of Missouri. The information sought to be filed under seal in the Complaint includes (a) confidential terms of a certain contract, described in the accompanying Memorandum, to which Tyson was a signatory, and (b) a confidential internal valuation of the cost to Tyson to undertake certain business activities.
4. The instant motion should be granted in the interest of protecting the privacy interests of the signatories to the contract. Tyson’s legitimate interest in keeping the information regarding its business strategies and the non-public terms of its commercial contracts sealed outweighs the presumption of public access.
5. The duration of this request shall last while this Action is maintained, or until Tyson agrees otherwise in writing.
6. As this Motion is being filed concurrently with the opening of the case, Tyson has not yet ascertained whether opposing counsel consents to or opposes this Motion.

Date: August 9, 2024

Respectfully submitted,

By: /s/ Kail J. Jethmalani

Kail J. Jethmalani (*pro hac vice*
forthcoming)

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*Counsel for Plaintiffs Tyson Foods, Inc. and
Tyson Chicken, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2024, I electronically transmitted the foregoing document to the Clerk of Court using the ECF system for filing. A true and correct copy of the foregoing will be served promptly via email to Defendants' counsel.

By: /s/ Kail J. Jethmalani
Kail J. Jethmalani